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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MAURICIO JASSO, individually and in his
capacity as the Court-Appointed Receiver of
JAMA INVESTMENT GROUP, INC.,
GUILLERMO SESMA, SYLVIA MARTINEZ
SALINAS, BELISARIO JASSO BALDINI,
JAVIER RAMIREZ LARES, ANTONIO
BACHALANI, RODRIGO FERNANCEZ
JUAN ROMERO, and BERNARDO
VILLACECIAS,

Plaintiffs,

vs.

WELLS FARGO BANK, N.A., KATHERINE
DARRALL and JOSE RICO,

Defendants.

Case No. 2:20-CV-00858-RFB-BNW

**STIPULATION AND ORDER FOR
EXTENSION TO REPLY TO
PLAINTIFFS' FOURTH MOTION TO
COMPEL WELLS FARGO BANK, N.A.
TO PRODUCE DOCUMENTS AND
ADD CUSTODIANS [ECF NO. 70]**

(FIRST REQUEST)

Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1, Plaintiffs Mauricio Jasso (“Jasso”), individually and in his capacity as the court-appointed receiver of JAMA Investment Group, Inc. (“JAMA”), Guillermo Sesma (“Sesma”), Sylvia Martinez Salinas (“Salinas”), Belisario Jasso Baldini (“Baldini”), Javier Ramirez Lares (“Lares”), Antonio Bachalani (“Bachalani”), Rodrigo Fernandez (“Fernandez”), Juan Romero (“Romero”), and Bernardo Villacecias (“Villacecias”) (collectively, “Plaintiffs”), and Defendants Wells Fargo Bank, N.A. (“Wells Fargo”), Katherine Darrall (“Darrall”), and Jose Rico (“Rico”) (collectively, “Defendants” and together with Plaintiffs, the “Parties”) by and through their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Plaintiffs’ deadline to file its Reply in Support of Plaintiffs’ Fourth Motion to Compel Wells Fargo Bank, N.A. to Produce Documents and Add Custodians [ECF No. 70] (the “Motion”) by six days, from Friday, August 20, 2021, to Wednesday, August 26, 2021 for the following reasons:

1. Plaintiffs filed the Motion on July 28, 2021 [ECF No. 70].
2. Defendants filed Response to the Motion [ECF No. 81] on August 13, 2021.
3. Plaintiffs’ Reply in Support of the Motion is currently due on August 20, 2021.
4. A hearing on the Motion [ECF No. 70] is currently set for September 21, 2021 before the Honorable Magistrate Judge Brenda Weksler, as stated in the Court’s July 29, 2021 Minute Order [ECF No. 74].
5. Plaintiffs assert that there is good cause for six additional days to file its Reply to allow for input from key individuals who have been or are currently, out of the office.
6. Plaintiffs also request this brief extension to analyze and respond to Defendants’ Response to the Motion to ensure that the numerous issues raised in the Response are addressed. This additional basis also qualifies as good cause.
7. No prejudice will result due to a 6-day extension, considering the hearing is not scheduled until September 21, 2021.

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1 This extension request is sought in good faith and is not made for the purpose of delay.

2 THEREFORE, for good cause shown, the Parties respectfully request an extension for
3 Plaintiffs to file its Reply in Support of the Motion [ECF No. 70] from August 20, 2021, to and
4 including August 26, 2021.

5
6 DATED this 19th day of August, 2021.

7 PARSONS BEHLE & LATIMER

8 /s/ Zachary S. Shea

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28 *Attorneys for Plaintiffs*

DATED this 19th day of August, 2021.

SNELL & WILMER L.L.P.

/s/ Erica J. Stutman (with permission)

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*Attorneys for Wells Fargo Bank, N.A.,
Katherine Darrall, and Jose Rico*

IT IS SO ORDERED.

DATED: August 20, 2021.



UNITED STATES MAGISTRATE JUDGE